



ARAQMD
Protecting our Air

AKRON REGIONAL AIR QUALITY MANAGEMENT DISTRICT

Agent of the Ohio Environmental Protection Agency * A Service of Summit County Public Health * Serving Medina, Portage and Summit Counties

Telephone: (330) 375-2480 * Fax: (330) 752-7792
araqmd@schd.org

Sam Rubens, MPA, R.S.
Administrator

March 13, 2018

John Polak
PPG South Plant
4829 Fairland Road
Barberton, OH 44203

**Re: PPG South Plant
Notice of Violation (NOV)
Air Permit
Summit County
1677020162**

Subject: Notice of Violation

Dear John Polak:

On January 31, 2018, PPG South Plant ("PPG") performed emissions testing on emissions unit P098, the Chloroformate Plant, controlled with the thermal oxidizer and the tails scrubber. The emissions test was performed to demonstrate compliance with the allowable organic materials (OM) emission limitation outlined in the terms and conditions of Title V permit P0120260 and Permit to Install (PTI) P0106015.

Findings

Based on a review of the emission test results, Akron Regional Air Quality Management District ("ARAQMD") has determined that emissions unit P098 when controlled with the thermal oxidizer and the tails scrubber is not in compliance with the permitted allowable OM emission limitation. In order to bring your facility into compliance, we recommend promptly addressing these violations within the timeframes outlined in this letter.

1. Ohio Revised Code (ORC) 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

Permit term and condition C.1.b)(1)a. of Title V permit P0120260 and PTI P0106015: *"Organic materials emissions shall not exceed 2.0 pounds per hour (limitation established "as carbon"). "*

(a) Description of Violation:

The emission rate for emissions unit P098 when controlled by the thermal oxidizer and the tails scrubber exceeds the permitted hourly allowable OM emission limitation based on the results from the January 31, 2018 emission test submitted on February 26, 2018. The follow summarizes the test results:

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- i. Run #1 – 10.92 lbs/hr
- ii. Run #2 – 2.95 lbs/hr
- iii. Run #3 – 0.21 lb/hr
- iv. Average – 4.69 lbs/hr

(b) Requested action:

PPG shall develop and submit to ARAQMD a compliance plan to bring emissions unit P098 into compliance with the hourly allowable OM emission limitation within 30 days of receipt of this letter.

Conclusion

The ARAQMD requests that PPG promptly undertake the necessary measures to return to compliance with Ohio's environmental laws and regulations. Within 30 days of receipt of this letter, please provide, to ARAQMD, the documentation requested above. If you have already resolved the violations listed above, thank you, and please provide documentation supporting compliance.

Failure to comply with Chapter 3704. of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, PPG is requested to submit written correspondence describing the steps that will be taken by date certain to attain compliance.

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Section 3704.06 of the Ohio Revised Code.

Should you have any questions, please contact me at (330) 812-3953 or e-mail lmiracle@schd.org.

Sincerely,



Laura Miracle
Air Quality Engineer
Akron Regional Air Quality Management District

cc: John Paulian/James Kavalec, DAPC/CO
Sam Rubens/Julie Brown, ARAQMD
Brian Dickens, USEPA Region V